UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

TERRAFORM LABS PTE LTD. and DO KWON,

Plaintiffs,

v.

Hon J. Paul Oetken

Case No. 1:21-cv-08701-JPO

UNITED STATES SECURITIES AND EXCHANGE COMMISSION,

Defendant.

NOTICE OF DISMISSAL WITHOUT PREJUDICE

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiffs Terraform Labs Pte Ltd. and Do Kwon ("Plaintiffs"), by and through their undersigned counsel, hereby dismiss without prejudice all claims and causes of action asserted in the above-captioned action against Defendant United States Securities and Exchange Commission, with Plaintiffs and Defendant to bear their own costs, expenses, and attorneys' fees.

Respectfully submitted,

By: /s/ Douglas W. Henkin

Douglas Henkin DENTONS US LLP 1221 Avenue of the Americas New York, New York 10020-1089

Tel: (212) 768-6700

douglas.henkin@dentons.com

Stephen J. Senderowitz DENTONS US LLP 233 S. Wacker Drive Chicago, Illinois 60606 Tel: (312) 876-8141

stephen.senderowitz@dentons.com

Attorneys for Plaintiffs Terraform Labs PTE Ltd. and Do Kwon